

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC
OF VENEZUELA,

Defendant.

C.A. No. 17-mc-151-LPS

**DECLARATION OF JASON W. MYATT IN SUPPORT OF
CRYSTALLEX INTERNATIONAL CORPORATION'S
MEMORANDUM IN RESPONSE TO OBJECTIONS TO
SPECIAL MASTER'S FINAL RECOMMENDATION**

I, Jason W. Myatt, declare as follows:

1. I am a partner in the New York office of Gibson, Dunn & Crutcher LLP, and I am counsel for Crystallex International Corporation in the above-captioned action.

2. I make this declaration in support of Crystallex International Corporation's Memorandum in Response to Objections to the Special Master's Final Recommendation based upon personal knowledge.

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the transcript of the July 24, 2025 deposition of Randall J. Weisenburger, which has been designated "Confidential" and "Attorneys' Eyes Only."

4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the transcript of the July 30, 2025 deposition of Jose Alberro, which has been designated "Highly Confidential."

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Supplemental Declaration of William O. Hiltz in Support of the Special Master's Final Recommendation, which has been designated "Highly Confidential."

6. Attached hereto as **Exhibit 4** is a true and correct copy of Exhibit A to the Supplemental Declaration of William O. Hiltz in Support of the Special Master's Final Recommendation, which has been designated "Highly Confidential."

7. Attached hereto as **Exhibit 5** is a true and correct copy of the August 3, 2025 Second Supplemental Declaration of William O. Hiltz in Support of the Special Master's Final Recommendation, which has been designated "Highly Confidential."

8. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the transcript of the July 29, 2025 deposition of Xiao Song.

9. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from PDV Holding, Inc.'s *Report for the Fiscal Year Ended December 31, 2024*, which has been designated "Confidential."

10. Attached hereto as **Exhibit 8** is a true and correct copy of the July 7, 2025 Expert Report of J.B. Heaton, J.D., M.B.A., Ph.D.

11. Attached hereto as **Exhibit 9** is a true and correct copy of the Venezuela Parties' July 22, 2025 Notice of Rule 30(b)(6) Deposition of Gold Reserve, Inc.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 7th day of August 2025, in New York, NY.

/s/ Jason W. Myatt
Jason W. Myatt